

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

MAE RUSHING,

Plaintiff,

v.

HUNTER WARFIELD, INC.,

Defendant.

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CASE No.: 3:22-cv-02434-L

**DEFENDANT HUNTER WARFIELD, INC.’S ORIGINAL ANSWER TO PLAINTIFF’S
COMPLAINT**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, Defendant Hunter Warfield, Inc. (“Defendant” or “HWI”), and files this Answer to Plaintiff Mae Rushing (“Plaintiff”)’s Complaint and would respectfully show unto the Court as follows:

NATURE OF THE ACTION

HWI admits that Plaintiff brought this case pursuant to the Fair Debt Collection Practices Act, 15 U.S.C. § 1692 *et seq.* (“FDCPA”). HWI denies that it violated any statutory provisions of the FDCPA.

JURISDICTION AND VENUE

HWI lacks knowledge or information sufficient to form a belief about the truth of the Complaint’s allegations related to the Court’s jurisdiction and/or venue; therefore, HWI denies the same.

CAUSES OF ACTION

Count I. HWI denies Count I of the Complaint.

Count II. HWI denies Count II of the Complaint. *See Exhibit A; Exhibit B; Exhibit C.*

- Count III. HWI denies Count III of the Complaint. *See Exhibit A.*
- Count IV. HWI denies Count IV of the Complaint. *See Exhibit B; Exhibit C.*
- Count V. HWI denies Count V of the Complaint.
- Count VI. HWI denies Count IV of the Complaint. *See Exhibit B; Exhibit C.*
- Count VII. HWI denies Count IV of the Complaint.
- Count VIII. HWI denies Count IV of the Complaint.

PRAYER FOR RELIEF

HWI denies Plaintiff's Prayer for Relief and its subparts and denies that Plaintiff is entitled to any damages or relief.

AFFIRMATIVE DEFENSES

Plaintiff has failed to mitigate damages, if any.

Plaintiff's damages, if any, are the result of a pre-existing injury.

Any violation, if it occurred, is a result of a bona fide error.

Plaintiff's damages complained of are the result of a third party over whom HWI has no control.

WHEREFORE, PREMISES CONSIDERED, Defendant Hunter Warfield, Inc., respectfully requests that this Court dismiss with prejudice all claims against Defendant.

[SIGNATURE BLOCK ON NEXT PAGE]

Dated: November 8, 2022.

Respectfully submitted,

FROST ECHOLS LLC

/s/ KHARI M. FERRELL

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***COUNSEL FOR DEFENDANT
HUNTER WARFIELD, INC.***

CERTIFICATE OF SERVICE

The undersigned certifies that she forwarded a copy of the foregoing pleading to all parties entitled to notice of same via **Email/CMRR** on this 8th day of November 2022:

Mae Rushing
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Plaintiff—Pro se

/s/ Khari Ferrell

KHARI M. FERRELL